

~~SEALED DOCUMENT PURSUANT
TO E-GOVERNMENT ACT OF 2002~~

FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2007 JUN 20 PM 1:58

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

SA 07 CR 365 XR

UNITED STATES OF AMERICA,

) CRIMINAL NO. SA-07-CR

Plaintiff,

) INDICTMENT

v.

) [Violation: 8 U.S.C. § 1324(a)(1)(A)(ii),
ISABEL CONSUELO OCHOA (1),
CONSUELO PILAR OCHOA (2),
MARIA DE JESUS OCHOA (3),
a/k/a/ "Jessica,"
TIMOTHY MICHAEL GERE (4), and
BRENT ANDREW STEPHENS (5)) (a)(1)(A)(v)(I) and (a)(1)(B)(i)-Conspiracy to
transport aliens; 8 U.S.C. § 1324(a)(1)(A)(iii),
(a)(1)(A)(v)(I) and (a)(1)(B)(i)-Conspiracy to
harbor aliens; 18 U.S.C. §§ 2 and 1591(a)-
Aiding and abetting sex trafficking of a child and
sex trafficking by force, fraud, and coercion;
18 U.S.C. § 924(c)(1)(A)(ii)-Using firearm in
relation to a crime of violence]

Defendants.

)

)

THE GRAND JURY CHARGES:

COUNT ONE

Beginning on or about May 16, 2007, and continuing until on or about May 25, 2007, in the Western District of Texas and elsewhere, the Defendants,

ISABEL CONSUELO OCHOA,
CONSUELO PILAR OCHOA,
MARIA DE JESUS OCHOA, a/k/a "Jessica,"
TIMOTHY MICHAEL GERE,
and BRENT ANDREW STEPHENS

did unlawfully and willfully combine, conspire, confederate and agree with each other, and with other persons both known and unknown to the Grand Jury, knowingly and in reckless disregard of the fact that aliens had come to, entered and remained in the United States in violation of law, to

transport and move and attempt to transport and move such aliens for the purpose of commercial advantage and private financial gain in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii), (a)(1)(A)(v)(I), and (a)(1)(B)(i).

COUNT TWO

Beginning on or about May 16, 2007, and continuing until on or about May 25, 2007, in the Western District of Texas and elsewhere, the Defendants,

ISABEL CONSUELO OCHOA,
CONSULEO PILAR OCHOA,
MARIA DE JESUS OCHOA, a/k/a "Jessica,"
TIMOTHY MICHAEL GEREBC,
and BRENT ANDREW STEPHENS

did unlawfully and willfully combine, conspire, confederate and agree with each other, and with other persons both known and unknown to the Grand Jury, knowingly and in reckless disregard of the fact that aliens had come to, entered and remained in the United States in violation of law, to conceal, harbor and shield from detection such aliens for the purpose of commercial advantage and private financial gain in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), (a)(1)(A)(v)(I), and (a)(1)(B)(i).

COUNT THREE

Beginning on or about May 16, 2007, and continuing until on or about May 25, 2007, in the Western District of Texas, the Defendants,

ISABEL CONSUELO OCHOA,
CONSULEO PILAR OCHOA,
MARIA DE JESUS OCHOA, a/k/a "Jessica,"
TIMOTHY MICHAEL GEREBC,
and BRENT ANDREW STEPHENS

aided and abetted by each other and by other persons both known and unknown to the Grand Jury, did knowingly, in or affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain by any means V.P., a minor, knowing that V.P. had not attained the age of 18 years and would be caused to engage in a commercial sex act and knowing that force, fraud, and coercion would be used to cause V.P. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 2 and 1591(a).

COUNT FOUR

Beginning on or about May 16, 2007, and continuing until on or about May 25, 2007, in the Western District of Texas, the Defendants,

ISABEL CONSUELO OCHOA,
CONSUELO PILAR OCHOA,
MARIA DE JESUS OCHOA, a/k/a "Jessica,"
TIMOTHY MICHAEL GEREK,
and BRENT ANDREW STEPHENS

aided and abetted by each other and by other persons both known and unknown to the Grand Jury, did knowingly, in or affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain by any means S.P., a minor, knowing that S.P. had not attained the age of 18 years and would be caused to engage in a commercial sex act and knowing that force, fraud, and coercion would be used to cause S.P. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 2 and 1591(a).

COUNT FIVE

Beginning on or about May 16, 2007, and continuing until on or about May 25, 2007, in the Western District of Texas, the Defendants,

ISABEL CONSUELO OCHOA,
CONSULEO PILAR OCHOA,
MARIA DE JESUS OCHOA, a/k/a "Jessica,"
TIMOTHY MICHAEL GEREBO,
and BRENT ANDREW STEPHENS

aided and abetted by each other and by other persons both known and unknown to the Grand Jury, did knowingly, in or affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain by any means M.B. knowing that force, fraud, and coercion would be used to cause M.B. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 2 and 1591(a).

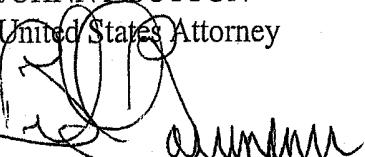
COUNT SIX

On or about the 19th day of May, 2007, in the Western District of Texas, the defendant, TIMOTHY MICHAEL GEREBO knowingly used, carried, possessed, and brandished a firearm, during and in relation to and in furtherance of a crime of violence for which the said TIMOTHY MICHAEL GEREBO could be prosecuted in a court of the United States, to-wit: sex trafficking of a child and sex trafficking of a person by force, fraud and coercion in violation in Title 18, United States Code, Section 1591, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

A TRUE BILL:


FOREPERSON

JOHNNY SUTTON
United States Attorney


BILL BAUMANN
Assistant United States Attorney


JONATHAN SKRMETTI
Trial Attorney, Civil Rights Division